

EXHIBIT D

EXHIBIT D

EXHIBIT D

(INVOICES)

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

October 31, 2020

Invoice 128204

Client 33085

Matter 00001

JDF

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2020

FEES	\$25,840.00
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EXPENSES	\$90.80
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TOTAL CURRENT CHARGES	\$25,930.80
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BALANCE FORWARD	\$183,629.22
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TOTAL BALANCE DUE	\$182,187.72
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Gupta, Kavita (Desert Oasis)
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	27.30	\$21,840.00
JDF	Fiero, John D.	Partner	800.00	4.80	\$3,840.00
KHB	Brown, Kenneth H.	Partner	800.00	0.20	\$160.00
				32.30	\$25,840.00

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Gupta, Kavita (Desert Oasis)
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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	17.40	\$13,920.00
BL	Bankruptcy Litigation [L430]	4.50	\$3,600.00
CA	Case Administration [B110]	1.80	\$1,440.00
RP	Retention of Prof. [B160]	8.60	\$6,880.00
		32.30	<hr/> \$25,840.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$82.00
Reproduction/ Scan Copy	\$8.80
	<hr/>
	\$90.80

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				Hours	Rate	Amount
Asset Analysis/Recovery[B120]						
10/20/2020	GSG	AA	Review decision and order re trustee appointment	0.60	800.00	\$480.00
10/20/2020	GSG	AA	Review Desert Land claim	0.30	800.00	\$240.00
10/20/2020	GSG	AA	Call with J. Fiero re strategy	0.10	800.00	\$80.00
10/20/2020	GSG	AA	Review dockets re Desert Entities re background.	1.90	800.00	\$1,520.00
10/20/2020	GSG	AA	Review orders re subcon, conversion, and trustee appointments.	0.90	800.00	\$720.00
10/21/2020	GSG	AA	Review dockets re history and prior bankruptcy and claim disputes.	2.10	800.00	\$1,680.00
10/23/2020	GSG	AA	Review substantive consolidation motions and docket re related activity.	1.80	800.00	\$1,440.00
10/26/2020	GSG	AA	Review objections to subcon and factual history	1.40	800.00	\$1,120.00
10/26/2020	GSG	AA	Review prior DOA bankruptcies re scheduled and filed claims and treatment of Desert Land.	1.50	800.00	\$1,200.00
10/26/2020	GSG	AA	Telephone call and emails to/from Fineman re status and conference call scheduling.	0.40	800.00	\$320.00
10/27/2020	GSG	AA	Review schedules and pleadings re Desert Land and creditors; notes re same.	1.10	800.00	\$880.00
10/28/2020	GSG	AA	Review DOA/DL docket and relevant pleadings, including schedules, amendments, claim objections, and disclosures.	2.90	800.00	\$2,320.00
10/28/2020	GSG	AA	Research re Rule 11 sanctions and related case law.	2.10	800.00	\$1,680.00
10/30/2020	GSG	AA	Emails to/from client re orders, turnover of documents to Golden, and intro to counsel.	0.30	800.00	\$240.00
				17.40		\$13,920.00

Bankruptcy Litigation [L430]

10/15/2020	JDF	BL	Review DOA docket and pleadings	1.10	800.00	\$880.00
10/20/2020	GSG	BL	Emails to/from J. Fiero re 9th Cir. pleading and substantive consolidation.	0.20	800.00	\$160.00
10/26/2020	JDF	BL	Review/research Rule 2004 as preliminary tool before filing rule 11 motion or claim objection	0.20	800.00	\$320.00

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				Hours	Rate	Amount
10/26/2020	KHB	BL	Confer with J. Fiero re discovery issues.	0.20	800.00	\$160.00
10/26/2020	JDF	BL	Confer with firm experts re discovery issues	0.20	800.00	\$160.00
10/27/2020	JDF	BL	Prepare for Nuti Hart informational call with G. Greenwood	0.70	800.00	\$560.00
10/27/2020	JDF	BL	Conference call with Nuti Hart and G. Greenwood re case background.	0.90	800	\$720.00
10/28/2020	JDF	BL	Conference call with counsel for Gonzales re strategy issues	0.50	800.00	\$400.00
10/28/2020	GSG	BL	Conference call with Gonzales counsel re case status and Desert Land claim (.4); confer with J. Fiero re same (.1).	0.40	800.00	\$320.00
10/28/2020	GSG	BL	Confer with J. Fiero re Desert Land claim.	0.10	800.00	\$80.00
				4.50		\$3,600.00

Case Administration [B110]

10/15/2020	JDF	CA	Prepare notice of appearance and forward same to local counsel for review	0.20	800.00	\$160.00
10/20/2020	JDF	CA	Work with G. Greenwood on case approach and preparation of employment materials	0.60	800.00	\$480.00
10/27/2020	GSG	CA	Review USBC D. Nev. LBR re formatting and orders.	0.10	800.00	\$80.00
10/27/2020	GSG	CA	Con call with Trustee's counsel re case background status.	0.90	800.00	\$720.00
				1.80		\$1,440.00

Retention of Prof. [B160]

10/20/2020	GSG	RP	Call and emails to/from S. Lawson re filings and designation of local counsel.	0.20	800.00	\$160.00
10/20/2020	GSG	RP	Begin draft of employment application.	0.60	800.00	\$480.00
10/21/2020	GSG	RP	Telephone call with S. Lawson and email re immediate filings.	0.20	800.00	\$160.00
10/21/2020	GSG	RP	Review LBR, Civil Rules, and forms and confer re 3-year filings.	0.60	800.00	\$480.00
10/21/2020	GSG	RP	Confer with OMC re employment application filings	0.20	800.00	\$160.00
10/21/2020	GSG	RP	Review and revise pro hac applications.	0.50	800.00	\$400.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/21/2020	GSG	RP	Draft employment application re PSZJ.	0.70	800.00	\$560.00
10/22/2020	GSG	RP	Draft/revise employment application.	0.90	800.00	\$720.00
10/22/2020	GSG	RP	Draft J. Fiero declaration re disinterestedness in support of employment application.	1.10	800.00	\$880.00
10/22/2020	GSG	RP	Review emails and circulate employment applications and pro hac applications.	0.30	800.00	\$240.00
10/22/2020	GSG	RP	Finalize and notarize pro hac application.	0.20	800.00	\$160.00
10/26/2020	JDF	RP	Revise employment application and supporting declaration	0.40	800.00	\$320.00
10/26/2020	GSG	RP	Emails to/from PSZJ, Larson, and client re pro hac applications, orders, and employment app.	0.30	800.00	\$240.00
10/26/2020	GSG	RP	Confer with J. Fiero and finalize edits to employment app.	0.30	800.00	\$240.00
10/27/2020	GSG	RP	Draft/revise employment application and declaration.	1.10	800.00	\$1,280.00
10/27/2020	GSG	RP	Draft proposed order re proposed app.	0.50	800.00	\$1,280.00
10/27/2020	GSG	RP	Confer with J. Fiero re employment app and filings.	0.20	800.00	\$160.00
10/27/2020	GSG	RP	Revise employment app and related documents and circulate to local counsel.	0.30	800.00	\$240.00
				8.60		\$6,880.00
TOTAL SERVICES FOR THIS MATTER:						\$25,840.00

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Expenses

10/21/2020	OS	State Bar of California, H. Phan	\$41.00
10/22/2020	OS	State Bar of California, H. Phan	\$41.00
10/29/2020	RE2	SCAN/COPY (72 @0.10 PER PG)	\$7.20
10/29/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	\$1.60

Total Expenses for this Matter

\$90.80

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 10/31/2020

Total Fees \$25,840.00

Total Expenses \$90.80

Total Due on Current Invoice \$25,930.80

Outstanding Balance from prior invoices as of 10/31/2020 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
127395	01/31/2021	\$7,248.50	\$12.10	\$7,260.60
127405	02/28/2021	\$25,460.00	\$85.88	\$25,545.88
127565	03/31/2021	\$18,971.50	\$23.85	\$18,995.35

Total Amount Due on Current and Prior Invoices: \$182,187.72

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

November 30, 2020

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

Invoice 126635
Client 33085
Matter 00001
JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2020

FEES	\$89,520.00
EXPENSES	\$116.29
TOTAL CURRENT CHARGES	\$89,636.29
BALANCE FORWARD	\$27,372.30
TOTAL BALANCE DUE	\$117,008.59

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	98.40	\$78,720.00
JDF	Fiero, John D.	Partner	800.00	13.50	\$10,800.00
				<hr/> 111.90	<hr/> \$89,520.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	66.70	\$53,360.00
BL	Bankruptcy Litigation [L430]	42.30	\$33,840.00
CA	Case Administration [B110]	0.40	\$320.00
CO	Claims Admin/Objections[B310]	2.20	\$1,760.00
RP	Retention of Prof. [B160]	0.30	\$240.00
		<hr/> 111.90	<hr/> \$89,520.00

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Summary of Expenses

Description

Amount

Conference Call [E105]	\$1.89
Postage [E108]	\$16.20
Reproduction/ Scan Copy	\$98.20
	<hr/>
	\$116.29

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
11/01/2020	GSG	AA	Review March 2019 transcript re evidentiary hearing.	0.50	800.00	\$400.00
11/01/2020	GSG	AA	Review transcript re motion to appoint trustee.	0.70	800.00	\$560.00
11/02/2020	GSG	AA	Review DL and DOA cases re substantive consolidation issues and purported factual support.	3.10	800.00	\$2,480.00
11/02/2020	GSG	AA	Review DL and DOA cases re conflict disclosures, chronology and purported conflict re revised schedules.	2.10	800.00	\$1,680.00
11/02/2020	GSG	AA	Review DL and DOA cases re 2004 exams and investigation of debtors' affairs.	0.70	800.00	\$560.00
11/03/2020	GSG	AA	Review disclosures re timeline.	2.10	800.00	\$1,680.00
11/03/2020	GSG	AA	Prepare chronology of DL claim and amendments.	1.80	800.00	\$1,440.00
11/04/2020	GSG	AA	Review additional documents and finalize chronology re DOA/DL background.	0.90	800.00	\$720.00
11/04/2020	GSG	AA	Review pleadings re Rule 11 sanctions/motion and procedure.	0.70	800.00	\$560.00
11/04/2020	GSG	AA	Emails to/from local counsel re substantive consolidation hearing and transcript.	0.10	800.00	\$80.00
11/04/2020	GSG	AA	Review client email and attachments re dockets.	0.70	800.00	\$560.00
11/04/2020	GSG	AA	Gather client notes re prior bankruptcy of DOA and review.	0.90	800.00	\$720.00
11/04/2020	GSG	AA	Review/research re alter ego claim under Nevada law.	1.10	800.00	\$880.00
11/05/2020	GSG	AA	Research Nevada law re alter ego and single enterprise liability.	3.80	800.00	\$3,040.00
11/05/2020	GSG	AA	Conference call with J. Fiero re facts and theories.	1.20	800.00	\$960.00
11/05/2020	GSG	AA	Review docket re 2004 exams and evidence; notes re same.	0.40	800.00	\$320.00
11/05/2020	GSG	AA	Review adversary complaint against insiders re alleged breach of fiduciary duties etc. and damages.	0.30	800.00	\$240.00
11/05/2020	GSG	AA	Additional research re application of Rule 11 in bankruptcy cases.	1.20	800.00	\$1,440.00
11/05/2020	GSG	AA	Research re plan res judicata (1.2); additional research re application of Rule 11 in bankruptcy cases (.6).	0.60	800.00	\$1,440.00
11/06/2020	GSG	AA	Research Nevada law and construction of alter ego as remedy vs stand alone cause of action.	0.70	800.00	\$560.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/06/2020	GSG	AA	Draft memo re claim analysis: draft factual background.	6.10	800.00	\$4,880.00
11/07/2020	GSG	AA	Review 6/28/18 transcript re substantive consolidation and witness testimony.	0.90	800.00	\$720.00
11/08/2020	GSG	AA	Draft memo re claim analysis: draft substantive consolidation and court findings.	4.90	800.00	\$3,920.00
11/09/2020	GSG	AA	Draft memo re claim analysis: draft additional and factual background re prior bankruptcy.	5.60	800.00	\$4,480.00
11/09/2020	GSG	AA	Further research re alter ego liability under Nevada law.	1.50	800.00	\$1,200.00
11/09/2020	GSG	AA	Review Nevada bankruptcy opinions.	0.9	800.00	\$720.00
11/09/2020	GSG	AA	Review USBC D. Nev website re Rule 11 motions.	0.20	800.00	\$160.00
11/10/2020	GSG	AA	Draft memo re claim analysis: draft legal analysis re DL claim.	7.60	800.00	\$6,080.00
11/10/2020	GSG	AA	Review standing cases re Ahcom and progeny.	1.40	800.00	\$1,120.00
11/10/2020	GSG	AA	Review horizontal alter ego liability principles and cases.	0.80	800.00	\$640.00
11/11/2020	GSG	AA	Review additional 9th Circuit law re 9011 sanctions.	2.10	800.00	\$1,680.00
11/11/2020	GSG	AA	Draft memo re claim analysis: draft legal analysis re alleged substantive consolidation of DL/DOA and subordination of DL claim.	6.50	800.00	\$5,200.00
11/13/2020	JDF	AA	Review draft memo (.8); Revise memo (1.5); TC with G. Greenwood re finalization (.3)	2.60	800.00	\$2,080.00
11/13/2020	GSG	AA	Confer with J. Fiero re analysis and timing.	0.30	800.00	\$240.00
11/13/2020	GSG	AA	Revise and finalize memo to client.	1.00	800.00	\$840.00
11/18/2020	GSG	AA	Review claim register re secured creditors of DOA/DL debtors and filed claims.	0.70	800.00	\$560.00
				66.70		\$53,360.00

Bankruptcy Litigation [L430]

11/13/2020	JDF	BL	Prepare demand letter to counsel.	0.90	800.00	\$720.00
11/18/2020	GSG	BL	Confer with M. Renck re 2004 applications.	0.20	800.00	\$160.00
11/18/2020	GSG	BL	Draft factual statement re sanction motion.	4.40	800.00	\$3,520.00
11/20/2020	GSG	BL	Draft Rule 11 sanction motion.	4.90	800.00	\$3,920.00
11/23/2020	JDF	BL	Revise draft motion for rule 11 sanctions	1.30	800.00	\$1,040.00
11/23/2020	GSG	BL	Revise draft Rule 9011 motion and identify exhibits re same.	6.60	800.00	\$5,280.00
11/23/2020	GSG	BL	Telephone call with Wray re transcript copies and discovery; confer with M. Renck re drop box.	0.30	800.00	\$240.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/23/2020	GSG	BL	Review additional 9th Circuit cases re Rule 9011 sanctions.	0.90	800.00	\$720.00
11/24/2020	GSG	BL	Draft motion for rule 11 sanctions.	3.50	800.00	\$2,800.00
11/24/2020	GSG	BL	Draft motion re Rule 11 sanction (.7); draft supporting declaration (1.1).	1.80	800.00	\$1,440.00
11/24/2020	GSG	BL	Prepare voluminous exhibits to Rule 11 motion and confer H. Phan re timing and service.	1.10	800.00	\$880.00
11/24/2020	GSG	BL	Confer with J. Fiero re sanction motion and service; emails to/from K. Gupta re same.	0.30	800.00	\$240.00
11/24/2020	GSG	BL	Draft Rule 2004 exam application and order.	1.90	800.00	\$1,520.00
11/25/2020	JDF	BL	Revise final details on Rule 11 letter and exhibits.	1.40	800.00	\$1,120.00
11/25/2020	JDF	BL	Telephone call with client regarding strategy.	0.40	800.00	\$320.00
11/25/2020	GSG	BL	Review docket re motion to dismiss Desert Land and status; email J. Fiero re same.	0.40	800.00	\$320.00
11/25/2020	GSG	BL	Revise and finalize MPA re sanctions, motion, and declaration.	1.30	800.00	\$1,040.00
11/25/2020	GSG	BL	Review LBR re joinder and timing.	0.20	800.00	\$160.00
11/25/2020	GSG	BL	Email K. Coleman re motion to dismiss status.	0.10	800.00	\$80.00
11/25/2020	GSG	BL	Review revise tables to sanction motion and confer with H. Phan re service.	0.40	800.00	\$320.00
11/25/2020	GSG	BL	Conference call with J. Fiero and K. Gupta re dismissal joinder and Rule 11 motion; confer with J. Fiero re same.	0.40	800.00	\$320.00
11/27/2020	GSG	BL	Draft joinder and factual statement re motion to dismiss Desert Land.	1.60	800.00	\$1,280.00
11/27/2020	GSG	BL	Review transcripts of Gaffin, H. Bulloch, and B. Bulloch testimony.	1.30	800.00	\$1,040.00
11/27/2020	GSG	BL	Review 2/19/19 evidentiary hearing transcript re trustee appointment.	1.10	800.00	\$880.00
11/30/2020	JDF	BL	Review pleadings filed in association with Desert Land motion to dismiss	0.90	800.00	\$720.00
11/30/2020	GSG	BL	Draft memorandum of facts/law re joinder re motion to dismiss Desert Land.	3.40	800.00	\$2,720.00
11/30/2020	GSG	BL	Confer with M. Renck re docket and additional evidentiary hearings.	0.10	800.00	\$80.00
11/30/2020	GSG	BL	Emails re employment application.	0.10	800.00	\$240.00
11/30/2020	GSG	BL	Email Wray re joinder to motion to dismiss.	0.10	800.00	\$240.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2020	GSG	BL	Review email re DLLA confirmation re no pursuit of Desert Land claim following dismissal.	0.10	800.00	\$240.00
11/30/2020	GSG	BL	(Hold) Review DLLA reply re motion to dismiss; review/research section 1112(b) dismissal factors re joinder.	0.90	800.00	\$720.00
				<u>42.30</u>		<u>\$33,840.00</u>

Case Administration [B110]

11/02/2020	GSG	CA	Review Spraker calendar.	0.10	800.00	\$80.00
11/02/2020	GSG	CA	Emails among counsel re status.	<u>0.30</u>	800.00	<u>\$240.00</u>
				<u>0.40</u>		<u>\$320.00</u>

Claims Admin/Objections[B310]

11/05/2020	JDF	CO	Review documents gathered by G. Greenwood re dismissal issues.	1.10	800.00	\$880.00
11/05/2020	JDF	CO	Confer with G. Greenwood re path forward and recommendations to client.	1.10	800.00	\$880.00
				<u>2.20</u>		<u>\$1,760.00</u>

Retention of Prof. [B160]

11/25/2020	JDF	CO	Review employment application objections and forward same to client recommendations to client	0.30	800.00	\$240.00
				<u>0.30</u>		<u>\$240.00</u>

TOTAL SERVICES FOR THIS MATTER:

\$89,520.00

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 Gupta, Kavita (Desert Oasis)
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Expenses

10/28/2020	CC	Conference Call [E105] AT&T Conference Call, JDF	\$1.89
11/04/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	\$0.80
11/04/2020	RE2	SCAN/COPY (21 @0.10 PER PG)	\$2.10
11/04/2020	RE2	SCAN/COPY (70 @0.10 PER PG)	\$7.00
11/04/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	\$0.60
11/04/2020	RE2	SCAN/COPY (7 @0.10 PER PG)	\$0.70
11/04/2020	RE2	SCAN/COPY (50 @0.10 PER PG)	\$5.00
11/04/2020	RE2	SCAN/COPY (9 @0.10 PER PG)	\$0.90
11/04/2020	RE2	SCAN/COPY (19 @0.10 PER PG)	\$1.90
11/04/2020	RE2	SCAN/COPY (7 @0.10 PER PG)	\$0.70
11/04/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	\$1.10
11/04/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	\$0.50
11/04/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	\$0.50
11/04/2020	RE2	SCAN/COPY (23 @0.10 PER PG)	\$2.30
11/04/2020	RE2	SCAN/COPY (17 @0.10 PER PG)	\$1.70
11/18/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	\$1.20
11/24/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	\$1.40

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11/24/2020	RE2	SCAN/COPY (66 @0.10 PER PG)	\$6.60
11/24/2020	RE2	SCAN/COPY (86 @0.10 PER PG)	\$8.60
11/24/2020	RE2	SCAN/COPY (97 @0.10 PER PG)	\$9.70
11/24/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	\$0.20
11/24/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	\$0.10
11/25/2020	PO	Postage [E108] Postage, SF Mail Log	\$16.20
11/25/2020	RE2	SCAN/COPY (400 @0.10 PER PG)	\$40.00
11/25/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	\$0.40
11/25/2020	RE2	SCAN/COPY (42 @0.10 PER PG)	\$4.20
Total Expenses for this Matter			\$116.29

Pachulski Stang Ziehl & JonesLLP
Gupta, Kavita (Desert Oasis)
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Invoice 126635
November 30, 2020

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 11/30/2020

Total Fees \$89,520.00

Total Expenses \$116.29

Total Due on Current Invoice \$89,636.29

Outstanding Balance from prior invoices as of 11/30/2020 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126456	10/31/2020	\$27,281.50	\$90.80	\$27,372.30

Total Amount Due on Current and Prior Invoices: \$117,008.59

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

December 31, 2020

Invoice 126901

Client 33085

Matter 00001

JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2020

FEES	\$14,800.00
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EXPENSES	\$18.80
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TOTAL CURRENT CHARGES	\$14,818.80
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BALANCE FORWARD	\$117,008.59
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TOTAL BALANCE DUE	\$131,827.39
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Pachulski Stang Ziehl & JonesLLP
Gupta, Kavita (Desert Oasis)
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Invoice 126901
December 31, 2020

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	6.50	\$5,200.00
JDF	Fiero, John D.	Partner	800.00	10.50	\$8,400.00
SEG	Goldich, Stanley E.	Partner	800.00	1.50	\$1,200.00
				<hr/> 18.50	<hr/> \$14,800.00

Pachulski Stang Ziehl & JonesLLP
Gupta, Kavita (Desert Oasis)
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Invoice 126901
December 31, 2020

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	12.70	\$10,160.00
CA	Case Administration [B110]	0.10	\$80.00
CO	Claims Admin/Objections[B310]	2.50	\$2,000.00
RP	Retention of Prof. [B160]	3.20	\$2,560.00
		<hr/> 18.50	<hr/> \$14,800.00

Pachulski Stang Ziehl & JonesLLP
Gupta, Kavita (Desert Oasis)
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Page: 4
Invoice 126901
December 31, 2020

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$18.80
	\$18.80

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 - 00001

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 Invoice 126901
 December 31, 2020

				Hours	Rate	Amount
Bankruptcy Litigation [L430]						
12/08/2020	SEG	BL	Review John Fiero email regarding intercompany claim and conflict issues.	0.40	800.00	\$320.00
12/08/2020	SEG	BL	Review research materials and UST handbook discussion and email to John Fiero and Gail S. Greenwood regarding same.	1.10	800.00	\$880.00
12/01/2020	GSG	BL	Review response letter from Golden re Rule 11 motion.	0.40	800.00	\$320.00
12/01/2020	GSG	BL	Review attachments to Golden letter re Rule 11 motion.	0.30	800.00	\$240.00
12/01/2020	GSG	BL	Confer with J. Fiero re Rule 11 motion and response.	0.10	800.00	\$80.00
12/01/2020	GSG	BL	Review cases cited by Golden.	1.20	800.00	\$960.00
12/01/2020	GSG	BL	Prepare response and recommendations re Rule 11 motion and demand to "cease and desist."	0.40	800.00	\$320.00
12/01/2020	GSG	BL	Revise joinder re Desert Land dismissal.	0.20	800.00	\$160.00
12/01/2020	GSG	BL	Draft additional 2004 exam application and order re David Gaffin.	0.50	800.00	\$400.00
12/02/2020	JDF	BL	Further comments to joinder re dismissal	0.20	800.00	\$160.00
12/02/2020	GSG	BL	Telephone call with M. Wray re joinder status.	0.20	800.00	\$160.00
12/02/2020	GSG	BL	Confer with M. Renck re joinder exhibits for filing; email J. Fiero re status.	0.10	800.00	\$80.00
12/02/2020	GSG	BL	Emails from/to K. Gupta re Rule 11 motion and strategy re joinder.	0.50	800.00	\$400.00
12/03/2020	JDF	BL	Conference call with client re pending items	0.60	800.00	\$480.00
12/03/2020	GSG	BL	Confer with J. Fiero re dismissal and joinder status.	0.40	800.00	\$320.00
12/03/2020	GSG	BL	Confer with K. Brown and J. Fiero re conflict issues.	0.30	800.00	\$240.00
12/03/2020	GSG	BL	Telephone call with local counsel re joinder filing and service; email re same.	0.30	800.00	\$240.00
12/03/2020	GSG	BL	Conference call with K. Gupta and J. Fiero re Desert Land dismissal and hearing.	0.60	800.00	\$480.00
12/03/2020	GSG	BL	Email Larson re joinder status and no filing.	0.10	800.00	\$80.00
12/07/2020	GSG	BL	Review and respond to email re conflicts issue.	0.30	800.00	\$240.00
12/08/2020	JDF	BL	Review conflicts issue and confer with S. Goldich re same	0.40	800.00	\$320.00
12/08/2020	GSG	BL	Review Golden status report and emails re same.	0.20	800.00	\$160.00
12/09/2020	GSG	BL	Emails re conflicts and employment filing and hearing status.	0.20	800.00	\$160.00

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 - 00001

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 Invoice 126901
 December 31, 2020

				Hours	Rate	Amount
12/10/2020	JDF	BL	Prepare for and participate in dismissal hearing in Desert Land case	2.50	800.00	\$2,000.00
12/10/2020	JDF	BL	Report to client on outcome of hearing	0.20	800.00	\$160.00
12/10/2020	JDF	BL	Review and comment on form of order relating to dismissal hearing	0.30	800.00	\$240.00
12/10/2020	GSG	BL	Confer with J. Fiero re hearing and dismissal status.	0.20	800.00	\$160.00
12/17/2020	JDF	BL	TC with S. Gubner re case status	0.30	800.00	\$240.00
12/18/2020	JDF	BL	Review and analyze email from S. Gubner	0.20	800.00	\$160.00
				12.70		\$10,160.00

Case Administration [B110]

12/15/2020	JDF	CA	Follow up on request from Desert Land trustee	0.10	800.00	\$80.00
				0.10		\$80.00

Claims Admin/Objections[B310]

12/01/2020	JDF	CO	Confer with G. Greenwood re Rule 11 correspondence from Golden.	0.40	800.00	\$320.00
12/01/2020	JDF	CO	Review materials from Golden in response to Rule 11 motion.	0.90	800.00	\$720.00
12/21/2020	JDF	CO	Review S. Gubner email re proposed appeal and litigation	0.30	800.00	\$960.00
12/21/2020	JDF	CO	Legal research re authorities cited by S. Gubner	0.30	800.00	\$960.00
12/21/2020	JDF	CO	Email to client regarding settlement offer.	1.20	800.00	\$960.00
				2.50		\$2,000.00

Retention of Prof. [B160]

12/01/2020	JDF	RP	TC with UST regarding amendments to employment application	0.30	800.00	\$240.00
12/03/2020	JDF	RP	Work on additional conflict checking and draft supplemental declaration	0.70	800.00	\$560.00
12/08/2020	JDF	RP	Complete revisions to application and supplemental declaration	0.40	800.00	\$320.00
12/09/2020	JDF	RP	Revise form of order approving PSZJ employment (twice)	0.40	800.00	\$320.00
12/10/2020	JDF	RP	Prepare for and attend hearing on PSZJ employment	1.20	800.00	\$960.00
12/10/2020	JDF	RP	Circulate form of employment order conformed to comments at hearing	0.20	800.00	\$160.00
				3.20		\$2,560.00

TOTAL SERVICES FOR THIS MATTER:

\$14,800.00

Pachulski Stang Ziehl & JonesLLP
Gupta, Kavita (Desert Oasis)
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Invoice 126901
December 31, 2020

Expenses

12/31/2020	PAC	Pacer - Court Research	\$18.80
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Total Expenses for this Matter	\$18.80
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Pachulski Stang Ziehl & JonesLLP
 Gupta, Kavita (Desert Oasis)
 33085 - 00001

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 Invoice 126901
 December 31, 2020

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 12/31/2020

Total Fees \$14,800.00

Total Expenses \$18.80

Total Due on Current Invoice \$14,818.80

Outstanding Balance from prior invoices as of 12/31/2020 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126456	10/31/2020	\$27,281.50	\$90.80	\$27,372.30
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29

Total Amount Due on Current and Prior Invoices: \$131,827.39

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

January 31, 2021

Invoice 128206

Client 33085

Matter 00001

JDF

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2021

FEES \$5,920.00

EXPENSES \$12.10

TOTAL CURRENT CHARGES \$5,932.10

BALANCE FORWARD **\$182,187.72**

TOTAL BALANCE DUE **\$180,859.22**

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128206
January 31, 2021

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	5.10	\$4,080.00
JDF	Fiero, John D.	Partner	800.00	2.30	\$1,840.00
				<hr/> 7.40	<hr/> \$5,920.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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Invoice 128206
January 31, 2021

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	7.40	\$5,920.00
		7.40	<hr/> \$5,920.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128206
January 31, 2021

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$12.10
	<hr/>
	\$12.10

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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January 31, 2021

Bankruptcy Litigation [L430]				Hours	Rate	Amount
01/05/2021	JDF	BL	TC with client re settlement proposal from Gubner.	0.30	800.00	\$240.00
01/05/2021	JDF	BL	TC with J. Fischer re claim objection and potential settlement	0.60	800.00	\$480.00
01/06/2021	JDF	BL	Emails re Gubner settlement position	0.20	800.00	\$160.00
01/07/2021	JDF	BL	Call with client re settlement strategy	0.20	800.00	\$160.00
01/11/2021	JDF	BL	TC with J. Fischer re case status (.4); Email to J. Bregman re settlement response (.1)	0.50	800.00	\$400.00
01/20/2021	GSG	BL	Review and add comments to DOA Disclosure Statement.	1.80	800.00	\$1,680.00
01/20/2021	GSG	BL	Prepare and circulate blackline re Disclosure Statement comments.	0.30	800.00	\$1,680.00
01/20/2021	GSG	BL	Review docket and amended DL claim re status.	0.40	800.00	\$320.00
01/21/2021	GSG	BL	Emails to/from client re status.	0.10	800.00	\$240.00
01/21/2021	GSG	BL	Review status report re res judicata argument by Golden.	0.20	800.00	\$240.00
01/22/2021	JDF	BL	TC with G. Greenwood re client call	0.20	800.00	\$160.00
01/22/2021	JDF	BL	Prep for client call (.1); Client call (.2)	0.30	800.00	\$240.00
01/22/2021	GSG	BL	Call with J. Fiero and review blacklined Disclosure Statement.	0.20	800.00	\$160.00
01/22/2021	GSG	BL	Revise Disclosure Statement and circulate.	0.80	800.00	\$640.00
01/22/2021	GSG	BL	Review cases cited by Golden re res judicata.	0.40	800.00	\$320.00
01/22/2021	GSG	BL	Conference call with client re Disclosure Statement, res judicata response, and Desert Land dismissal.	0.60	800.00	\$480.00
01/22/2021	GSG	BL	Email client re res judicata case excerpt.	0.30	800.00	\$240.00
				7.40		\$5,920.00
TOTAL SERVICES FOR THIS MATTER:						\$5,920.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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January 31, 2021

Expenses

01/31/2021 PAC Pacer - Court Research

\$12.10

Total Expenses for this Matter

\$12.10

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

Page: 7
 Invoice 128206
 January 31, 2021

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 01/31/2021

Total Fees \$5,920.00

Total Expenses \$12.10

Total Due on Current Invoice \$5,932.10

Outstanding Balance from prior invoices as of 01/31/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
127405	02/28/2021	\$25,460.00	\$85.88	\$25,545.88
127565	03/31/2021	\$18,971.50	\$23.85	\$18,995.35
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80

Total Amount Due on Current and Prior Invoices: \$180,859.22

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

February 28, 2021

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

Invoice 128207
Client 33085
Matter 00001
JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2021

FEES	\$20,960.00
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EXPENSES	\$85.88
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TOTAL CURRENT CHARGES	\$21,045.88
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BALANCE FORWARD	\$180,859.22
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TOTAL BALANCE DUE	\$176,359.22
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Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128207
February 28, 2021

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	0.00	0.70	\$0.00
GSG	Greenwood, Gail S.	Counsel	800.00	20.20	\$16,160.00
JDF	Fiero, John D.	Partner	800.00	6.00	\$4,800.00
				<hr/> 26.90	<hr/> \$20,960.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128207
February 28, 2021

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	24.60	\$19,120.00
PD	Plan & Disclosure Stmt. [B320]	2.30	\$1,840.00
		26.90	<hr/> \$20,960.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128207
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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Lexis/Nexis- Legal Research [E	\$68.98
Pacer - Court Research	\$4.90
Reproduction/ Scan Copy	\$12.00
	<hr/>
	\$85.88

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 Invoice 128207
 February 28, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
02/12/2021	GSG	BL	Review Golden motion for allowance of claim for voting purposes and supporting documents.	1.20	800.00	\$960.00
02/16/2021	JDF	BL	TC with G. Greenwood to prepare for call with Fischer and Wray.	0.20	800.00	\$160.00
02/16/2021	JDF	BL	Conference call with Fischer, Wray and G. Greenwood re 3018 motion and responses.	0.30	800.00	\$240.00
02/16/2021	GSG	BL	Emails to/from J. Fiero and review docket re 3018 motion.	0.30	800.00	\$240.00
02/16/2021	GSG	BL	Call with J. Fiero re motion and strategy.	0.20	800.00	\$160.00
02/16/2021	GSG	BL	Conference call with Gonzales counsel re 3018 motion.	0.30	800.00	\$240.00
02/16/2021	GSG	BL	Emails to/from client re meeting.	0.10	800.00	\$80.00
02/16/2021	GSG	BL	Review file and confer with M. Renck re Plan and DS.	0.20	800.00	\$160.00
02/17/2021	GSG	BL	Review RS/Plan re voting classes and DL claim.	0.20	800.00	\$160.00
02/17/2021	GSG	BL	Conference call with J. Fiero and client re response to estimation motion.	0.70	800.00	\$560.00
02/18/2021	JDF	BL	Confer with G. Greenwood re strategy going forward	0.30	800.00	\$240.00
02/18/2021	GSG	BL	Confer with J. Fiero re status and follow-up research.	0.30	800.00	\$240.00
02/18/2021	GSG	BL	Call with client re response to estimation and response re alleged conflicts.	0.50	800.00	\$400.00
02/19/2021	GSG	BL	Telephone call and email from Fischer re loan and security interest.	0.10	800.00	\$80.00
02/19/2021	GSG	BL	Telephone call with J. Fischer re objection to estimation motion.	0.40	800.00	\$320.00
02/21/2021	GSG	BL	Research/review cases re advisory opinions, justiciability, and mootness.	2.10	800.00	\$1,680.00
02/22/2021	GSG	BL	Draft response/opposition to 3018 motion	7.90	800.00	\$6,560.00
02/22/2021	GSG	BL	Emails J. Fiero re estimation motion and reponse.	0.30	800.00	\$6,560.00
02/23/2021	JDF	BL	TC with counsel for Golden re opposition to plan (.6); Confer with G. Greenwood re pleading strategy (.3); TC with K. Coleman re going forward strategy (.2)	1.10	800.00	\$880.00
02/23/2021	GSG	BL	Emails to/from J. Fiero and telephone call re response by Brutzkus Gubner.	0.10	800.00	\$80.00
02/23/2021	GSG	BL	Review/revise/blackline changes re factual discussion to 3018 response.	0.50	800.00	\$400.00
02/23/2021	GSG	BL	Emails to client and local counsel re response to 3018 motion and filing.	0.20	800.00	\$160.00
02/23/2021	GSG	BL	Review Plan and DS, revise and blackline response to 3018 motion per client comments.	0.90	800.00	\$720.00

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 Invoice 128207
 February 28, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/23/2021	GSG	BL	Emails to/from client re 3018 motion and Plan and DS.	1.20	800.00	\$960.00
02/23/2021	GSG	BL	Email Wray/Fischer re joinder.	1.20	800.00	\$960.00
02/24/2021	JDF	BL	TC with K. Coleman re strategy	0.20	800.00	\$160.00
02/24/2021	JDF	BL	TC with G. Greenwood re approach to opposition filing	0.20	800.00	\$160.00
02/24/2021	JDF	BL	Review draft opposition prepared by Gonzales	0.30	800.00	\$240.00
02/24/2021	GSG	BL	Telephone call with Gupta re response to 3018 motion and strategy.	0.30	800.00	\$240.00
02/24/2021	GSG	BL	Telephone call and email Larson re response to 3018 motion and strategy.	0.10	800.00	\$80.00
02/24/2021	GSG	BL	Telephone calls with Fischer re separate response and joinder re opposition to 3018 motion.	0.40	800.00	\$320.00
02/24/2021	GSG	BL	Further calls with J. Fiero and Gupta re separate response and joinder re opposition to 3018 motion.	0.20	800.00	\$160.00
02/24/2021	GSG	BL	Incorporate additional comments from Gupta and Fischer; revise, blackline, and circulate same re 3018 response.	0.90	800.00	\$720.00
02/24/2021	GSG	BL	Review Gonzales opposition to 3018 motion and review related cases re mistaken AR entry.	0.60	800.00	\$480.00
02/24/2021	GSG	BL	Revise and blackline 3018 response re Golden vote and email client re same.	0.30	800.00	\$240.00
02/25/2021	JDF	BL	Review pleadings prepared by Fischer and Coleman.	0.30	800.00	\$240.00
02/25/2021	JDF	BL	TC with G. Greenwood re issues	0.10	800.00	\$80.00
02/25/2021	JDF	BL	TC with G. Greenwood re client call prep	0.30	800.00	\$240.00
02/25/2021	JDF	BL	TC with client regarding response to motion to allow claim for voting purposes	0.40	800.00	\$320.00
02/25/2021	GSG	BL	Accept and finalize client revisions to 3018 response; confer re exhibit.	0.20	800.00	\$160.00
02/25/2021	GSG	BL	Review objection re DL fees and telephone call with J. Fiero.	0.20	800.00	\$160.00
02/25/2021	GSG	BL	Conference call with client and J. Fiero re status and final strategy.	0.40	800.00	\$320.00
02/25/2021	GSG	BL	Call with J. Fiero re strategy.	0.10	800.00	\$80.00
02/25/2021	GSG	BL	Calls with Fischer and local counsel re response and joinder re 3018 Motion (.3); confer with local counsel re filing of joinder and service (.1).	0.40	800.00	\$320.00
				24.60		\$19,120.00

Plan & Disclosure Stmt. [B320]

02/12/2021	JDF	PD	Review and consider motion to allow claims for voting purposes	0.50	800.00	\$400.00
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Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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February 28, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/12/2021	JDF	PD	Confer with G. Greenwood re review and consider motion to allow claims for voting purposes	0.10	800.00	\$80.00
02/17/2021	JDF	PD	Confer with G. Greenwood and client re motion to allow vote	0.70	800.00	\$560.00
02/22/2021	JDF	PD	Review and analyze plan and disclosure statement	0.70	800.00	\$720.00
02/22/2021	JDF	PD	TC with S. Gubner and J. Bregman re plan (.2)	0.20	800.00	\$720.00
				<u>2.30</u>		<u>\$1,840.00</u>

TOTAL SERVICES FOR THIS MATTER:

\$20,960.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Expenses

02/16/2021	LN	33085.00001 Lexis Charges for 02-16-21	\$11.77
02/20/2021	LN	33085.00001 Lexis Charges for 02-20-21	\$9.73
02/22/2021	LN	33085.00001 Lexis Charges for 02-22-21	\$9.73
02/22/2021	LN	33085.00001 Lexis Charges for 02-22-21	\$28.02
02/22/2021	RE2	SCAN/COPY (23 @0.10 PER PG)	\$2.30
02/22/2021	RE2	SCAN/COPY (26 @0.10 PER PG)	\$2.60
02/23/2021	RE2	SCAN/COPY (71 @0.10 PER PG)	\$7.10
02/24/2021	LN	33085.00001 Lexis Charges for 02-24-21	\$9.73
02/28/2021	PAC	Pacer - Court Research	\$4.90

Total Expenses for this Matter

\$85.88

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
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 February 28, 2021

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 02/28/2021

Total Fees \$20,960.00

Total Expenses \$85.88

Total Due on Current Invoice \$21,045.88

Outstanding Balance from prior invoices as of 02/28/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
127565	03/31/2021	\$18,971.50	\$23.85	\$18,995.35
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80
128206	01/31/2021	\$5,920.00	\$12.10	\$5,932.10

Total Amount Due on Current and Prior Invoices: \$176,359.22

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

March 31, 2021

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

Invoice 128208

Client 33085

Matter 00001

JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2021

FEES	\$15,360.00
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EXPENSES	\$23.85
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TOTAL CURRENT CHARGES	\$15,383.85
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BALANCE FORWARD	\$176,359.22
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TOTAL BALANCE DUE	\$172,747.72
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Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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March 31, 2021

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	11.50	\$9,200.00
JDF	Fiero, John D.	Partner	800.00	7.70	\$6,160.00
				<hr/> 19.20	<hr/> \$15,360.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128208
March 31, 2021

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	14.50	\$11,600.00
PD	Plan & Disclosure Stmt. [B320]	4.70	\$3,760.00
		19.20	<hr/> \$15,360.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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March 31, 2021

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$4.85
Pacer - Court Research	\$19.00
	<hr/>
	\$23.85

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 March 31, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
03/01/2021	JDF	BL	Review opposition to fees filed by Gubner firm	0.30	800.00	\$240.00
03/01/2021	GSG	BL	Review fee objection and statements re NH alleged conflicts	0.70	800.00	\$560.00
03/01/2021	GSG	BL	Email client re NH fee objection.	0.20	800.00	\$160.00
03/02/2021	GSG	BL	Review NH response to fee objection.	0.40	800.00	\$320.00
03/02/2021	GSG	BL	Conference call with client and J. Fiero re NH fee objection.	0.30	800.00	\$240.00
03/03/2021	JDF	BL	Emails re K. Coleman pleading	0.10	800.00	\$80.00
03/03/2021	JDF	BL	Emails re upcoming March 11 hearing	0.20	800.00	\$160.00
03/03/2021	JDF	BL	TC with S. Gubner re settlement posture	0.20	800.00	\$160.00
03/03/2021	GSG	BL	Review final response to fee objection..	0.20	800.00	\$160.00
03/04/2021	JDF	BL	Two TCs with S. Gubner re claim resolution	0.60	800.00	\$480.00
03/04/2021	JDF	BL	TC with K. Gupta re claim resolution	0.40	800.00	\$320.00
03/04/2021	JDF	BL	TC with J. Fischer and M. Wray re pending negotiations	0.30	800.00	\$240.00
03/04/2021	GSG	BL	Conference call with J. Fiero and client re settlement discussions.	0.50	800.00	\$400.00
03/04/2021	GSG	BL	Conference call with J. Fiero and Gonzales counsel re settlement discussions.	0.30	800.00	\$240.00
03/09/2021	JDF	BL	Review documents in advance of DOA plan hearing	0.40	800.00	\$320.00
03/09/2021	JDF	BL	Confer with G. Greenwood re issues raised in the documents	0.20	800.00	\$160.00
03/09/2021	GSG	BL	Pull and circulate current pleadings from DL and DOA dockets for J. Fiero	0.30	800.00	\$240.00
03/09/2021	GSG	BL	Review Golden supplemental response, DLLA response, and prior hearing transcript re facts and arguments re alleged DL claim.	1.90	800.00	\$1,520.00
03/10/2021	GSG	BL	Telephone call with Fischer re compromise with Golden.	0.30	800.00	\$240.00
03/10/2021	GSG	BL	Telephone call with client re settlement.	0.30	800.00	\$240.00
03/10/2021	GSG	BL	Email to J. Fiero re settlement.	0.10	800.00	\$80.00
03/10/2021	GSG	BL	Telephone call with K. Coleman re settlement.	0.30	800.00	\$240.00
03/10/2021	GSG	BL	Telephone call with client re timing and issues re potential compromise by Golden.	0.50	800.00	\$400.00
03/10/2021	GSG	BL	Telephone call with Fischer re timing and issues re potential compromise by Golden.	0.10	800.00	\$80.00
03/10/2021	GSG	BL	Telephone call and email with J. Fiero re hearing and Plan issues (.3).	0.30	800.00	\$240.00
03/11/2021	GSG	BL	Telephone call with J. Fiero and K. Coleman re hearing (.2); telephone call with J. Fiero post-hearing.	0.40	800.00	\$320.00
03/11/2021	GSG	BL	Attend hearing re multiple motions, including Plan Confirmation and Desert Land dismissal.	3.70	800.00	\$2,960.00
03/16/2021	GSG	BL	Review emails and stipulation re further briefing and hearing	0.10	800.00	\$80.00
03/22/2021	JDF	BL	TC with C. Carlyon re request	0.10	800.00	\$80.00
03/22/2021	JDF	BL	Confer with G. Greenwood re Carylton request	0.10	800.00	\$80.00
03/22/2021	JDF	BL	Email to client re Carlyon message and inquiry	0.10	800.00	\$80.00

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 March 31, 2021

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/22/2021	GSG	BL	Pull insider complaint and email J. Fiero re same.	0.30	800.00	\$240.00
03/23/2021	GSG	BL	Review Schwartzer sup reply re fee application and DL dismissal.	0.20	800.00	\$160.00
03/23/2021	GSG	BL	Email client re insider adversary.	0.10	800.00	\$80.00
				14.50		\$11,600.00

Plan & Disclosure Stmt. [B320]

03/10/2021	JDF	PD	Emails with G. Greenwood re upcoming hearing (.1); TC with G. Greenwood re same (.3)	0.40	800.00	\$240.00
03/11/2021	JDF	PD	TC with K. Coleman and G. Greenwood re hearing	0.20	800.00	\$160.00
03/11/2021	JDF	PD	Prepare for hearing and outline issues re same	1.40	800.00	\$1,120.00
03/11/2021	JDF	PD	Attend hearing	2.50	800.00	\$2,000.00
03/11/2021	JDF	PD	Follow up phone call with G. Greenwood re hearing.	0.20	800.00	\$160.00
				4.70		\$3,760.00

TOTAL SERVICES FOR THIS MATTER:

\$15,360.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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March 31, 2021

Expenses

02/17/2021	CC	Conference Call [E105] AT&T Conference Call, GSG	\$4.85
03/31/2021	PAC	Pacer - Court Research	\$19.00
Total Expenses for this Matter			\$23.85

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

Page: 8
 Invoice 128208
 March 31, 2021

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 03/31/2021

Total Fees **\$15,360.00**

Total Expenses **\$23.85**

Total Due on Current Invoice **\$15,383.85**

Outstanding Balance from prior invoices as of 03/31/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80
128206	01/31/2021	\$5,920.00	\$12.10	\$5,932.10
128207	02/28/2021	\$20,960.00	\$85.88	\$21,045.88

Total Amount Due on Current and Prior Invoices: **\$172,747.72**

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

April 30, 2021

Invoice 128228

Client 33085

Matter 00001

JDF

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2021

FEES	\$9,680.00
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EXPENSES	\$12.93
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TOTAL CURRENT CHARGES	\$9,692.93
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BALANCE FORWARD	\$172,747.72
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TOTAL BALANCE DUE	\$182,440.65
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Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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April 30, 2021

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	4.30	\$3,440.00
JDF	Fiero, John D.	Partner	800.00	7.80	\$6,240.00
				<hr/> 12.10	<hr/> \$9,680.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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April 30, 2021

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	10.60	\$8,480.00
PD	Plan & Disclosure Stmt. [B320]	1.50	\$1,200.00
		12.10	<hr/> \$9,680.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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April 30, 2021

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$3.13
Lexis/Nexis- Legal Research [E	\$9.30
Pacer - Court Research	\$0.50
	<hr/>
	\$12.93

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 April 30, 2021

				Hours	Rate	Amount
Bankruptcy Litigation [L430]						
04/02/2021	JDF	BL	TC with G. Greenwood re conversion hearing	0.10	800.00	\$80.00
04/02/2021	JDF	BL	Prepare for and participate in conversion hearing	1.70	800.00	\$1,360.00
04/02/2021	GSG	BL	Telephone call with J. Fiero re status of conversion hearing.	0.10	800.00	\$80.00
04/05/2021	GSG	BL	Emails re status and review conversion order.	0.10	800.00	\$80.00
04/06/2021	JDF	BL	TC with G. Greenwood re case strategy	0.10	800.00	\$80.00
04/06/2021	JDF	BL	Email to client re recommended approach to claim objection	0.10	800.00	\$80.00
04/06/2021	JDF	BL	Review and approve form of order after hearing	0.10	800.00	\$80.00
04/06/2021	GSG	BL	Telephone call with J. Fiero and emails re status of claim and objection; review code re chapter 7 trustee appointment and objection.	0.10	800.00	\$80.00
04/07/2021	JDF	BL	Review correspondence from J. Fischer re claim objection	0.10	800.00	\$80.00
04/07/2021	JDF	BL	Send email to team re suggested approach	0.10	800.00	\$80.00
04/07/2021	GSG	BL	Review proposed UST letter from C. Carlyon.	0.20	800.00	\$160.00
04/07/2021	GSG	BL	Review proposed UST letter from C. Carlyon.	0.20	800.00	\$160.00
04/08/2021	JDF	BL	Strategy call with client and G. Greenwood in wake of conversion hearing	0.50	800.00	\$400.00
04/08/2021	GSG	BL	Call with K. Gupta re Desert Land objection and status.	0.50	800.00	\$400.00
04/09/2021	JDF	BL	Conference call with G. Greenwood and J. Fischer re new landscape	0.30	800.00	\$240.00
04/09/2021	GSG	BL	Call with C. Carlyon re status and trustee objection, review docket and email client re chapter 7 appointment.	0.30	800.00	\$240.00
04/09/2021	GSG	BL	Conference call with JDF and Gonzales counsel re joinder to claim objection re Desert Land.	0.30	800.00	\$240.00
04/13/2021	JDF	BL	TC with S. Gubner re settlement posture	0.20	800.00	\$400.00
04/13/2021	JDF	BL	Confer with client re message from Gubner	0.10	800.00	\$400.00
04/13/2021	JDF	BL	Email exchange with Gonzales counsel re mediation push	0.20	800.00	\$160.00
04/13/2021	GSG	BL	Review emails re mediation.	0.10	800.00	\$80.00

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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				Hours	Rate	Amount
04/15/2021	JDF	BL	Confer with G. Greenwood re mediation push status	0.10	800.00	\$80.00
04/22/2021	JDF	BL	Review and respond to client email re mediation strategy	0.20	800.00	\$160.00
04/22/2021	JDF	BL	Confer with Gonzales counsel re status of mediation	0.10	800.00	\$80.00
04/22/2021	GSG	BL	Emails to/from K. Gupta re mediation and costs.	0.20	800.00	\$160.00
04/23/2021	GSG	BL	Follow-up research re cases addressing account stated/mistake and res judicata; notes re same.	0.60	800.00	\$480.00
04/26/2021	JDF	BL	Emails with Gonzales counsel and DLLA counsel re status	0.10	800.00	\$80.00
04/26/2021	JDF	BL	TC with J. Fischer re status	0.20	800.00	\$160.00
04/26/2021	JDF	BL	Email to client reporting on call with Fischer	0.10	800.00	\$80.00
04/26/2021	GSG	BL	Review emails re mediation status.	0.10	800.00	\$80.00
04/28/2021	JDF	BL	Conference call with K. Gupta and G. Greenwood re mediation of claim objection issues	0.30	800.00	\$240.00
04/28/2021	GSG	BL	Telephone call with J. Fiero and K. Gupta re mediation of claims.	0.30	800.00	\$240.00
04/29/2021	JDF	BL	Conference call with K. Gupta and G. Greenwood re mediation strategy	0.70	800.00	\$1,120.00
04/29/2021	JDF	BL	Conference call with Fischer and Wray re mediation	0.50	800.00	\$1,120.00
04/29/2021	JDF	BL	TC with G. Carlyon re mediation	0.20	800.00	\$1,120.00
04/29/2021	GSG	BL	Telephone call with J. Fiero and K. Gupta re mediation and procedural issues.	0.70	800.00	\$560.00
04/29/2021	GSG	BL	Conference call with Wray and Fischer re mediation, costs, and scheduling.	0.50	800.00	\$400.00
04/30/2021	JDF	BL	Emails with client re strength of DOA case against Desert Land estate	0.20	800.00	\$160.00
				10.60		\$8,480.00

Plan & Disclosure Stmt. [B320]

04/30/2021	JDF	PD	Prepare for and participate in hearing on confirmation of bankruptcy plan	1.50	800.00	\$1,220.00
				1.50		\$1,220.00

TOTAL SERVICES FOR THIS MATTER:

\$9,680.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128228
April 30, 2021

Expenses

04/08/2021	CC	Conference Call [E105] AT&T Conference Call, GSG	\$3.13
04/23/2021	LN	33085.00001 Lexis Charges for 04-23-21	\$9.30
04/30/2021	PAC	Pacer - Court Research	\$0.50
Total Expenses for this Matter			\$12.93

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

Page: 8
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 April 30, 2021

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 04/30/2021

Total Fees \$9,680.00

Total Expenses \$12.93

Total Due on Current Invoice \$9,692.93

Outstanding Balance from prior invoices as of 04/30/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80
128206	01/31/2021	\$5,920.00	\$12.10	\$5,932.10
128207	02/28/2021	\$20,960.00	\$85.88	\$21,045.88
128208	03/31/2021	\$15,360.00	\$23.85	\$15,383.85
128213	05/31/2021	\$4,080.00	\$59.06	\$4,139.06

Total Amount Due on Current and Prior Invoices: \$186,579.71

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

May 31, 2021

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

Invoice 128229
Client 33085
Matter 00001
JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2021

FEES \$4,080.00

EXPENSES \$59.06

TOTAL CURRENT CHARGES \$4,139.06

BALANCE FORWARD **\$182,440.651**

TOTAL BALANCE DUE **\$186,579.71**

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128229
May 31, 2021

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	3.90	\$3,120.00
JDF	Fiero, John D.	Partner	800.00	1.20	\$960.00
				<hr/> 5.10	<hr/> \$4,080.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

Page: 3
Invoice 128229
May 31, 2021

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	5.10	\$4,080.00
		5.10	<hr/> \$4,080.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
33085 -00001

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Invoice 128229
May 31, 2021

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$6.06
Pacer - Court Research	\$53.00
	<hr/>
	\$59.06

Pachulski Stang Ziehl & Jones LLP
 Gupta, Kavita (Desert Oasis)
 33085 -00001

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				Hours	Rate	Amount
Bankruptcy Litigation [L430]						
05/10/2021	JDF	BL	Email to G. Greenwood re chapter 11 plan hearing	0.10	800.00	\$80.00
05/10/2021	GSG	BL	Review docket and emails to/from K. Coleman re confirmation.	0.20	800.00	\$160.00
05/11/2021	JDF	BL	Confer with counsel re mediation before Judge Sala	0.10	800.00	\$80.00
05/11/2021	GSG	BL	Review Bregman comments and emails re FOF/COL.	0.20	800.00	\$160.00
05/12/2021	GSG	BL	Review emails re objections to confirmation order.	0.10	800.00	\$80.00
05/13/2021	JDF	BL	Prepare email regarding separateness of dispute with Desert Land estate	0.20	800.00	\$160.00
05/17/2021	JDF	BL	Work on mediation scheduling	0.10	800.00	\$80.00
05/18/2021	JDF	BL	Review and forward email re scheduling	0.10	800.00	\$80.00
05/19/2021	JDF	BL	Review and forward email re scheduling to client	0.10	800.00	\$80.00
05/19/2021	GSG	BL	Review emails to/from chapter 7 trustee and client re mediation.	0.10	800.00	\$80.00
05/20/2021	GSG	BL	Conference call with K. Gupta re proposed mediation timing and details.	0.40	800.00	\$320.00
05/24/2021	JDF	BL	Emails with client and Fischer and Wray re timing of mediation	0.20	800.00	\$160.00
05/25/2021	GSG	BL	Additional emails re mediation.	0.10	800.00	\$80.00
05/26/2021	JDF	BL	Call with client re mediation posture	0.20	800.00	\$240.00
05/26/2021	JDF	BL	Emails with client re mediation options	0.10	800.00	\$240.00
05/26/2021	GSG	BL	Conference call with Fischer/Wray re mediation timing and costs.	0.30	800.00	\$240.00
05/26/2021	GSG	BL	Confer with J. Fiero re mediation.	0.10	800.00	\$80.00
05/26/2021	GSG	BL	Email K. Gupta re Gonzales' position re mediation and potential settlement.	0.20	800.00	\$160.00
05/26/2021	GSG	BL	Call with K. Gupta re mediation and timing of claim objection.	0.30	800.00	\$240.00
05/26/2021	GSG	BL	Call with M. Wray re claim objection and pending settlement offer.	0.10	800.00	\$80.00

Pachulski Stang Ziehl & Jones LLP
Gupta, Kavita (Desert Oasis)
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May 31, 2021

Expenses

05/20/2021	CC	Conference Call [E105] AT&T Conference Call, GSG	\$2.93
05/26/2021	CC	Conference Call [E105] AT&T Conference Call, GSG	\$3.13
05/31/2021	PAC	Pacer - Court Research	\$53.00
Total Expenses for this Matter			\$59.06

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 Gupta, Kavita (Desert Oasis)
 33085 -00001

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 May 31, 2021

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 05/31/2021

Total Fees \$4,080.00

Total Expenses \$59.06

Total Due on Current Invoice \$4,139.06

Outstanding Balance from prior invoices as of 05/31/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
126635	11/30/2020	\$89,520.00	\$116.29	\$89,636.29
126901	12/31/2020	\$14,800.00	\$18.80	\$14,818.80
128204	10/31/2020	\$25,840.00	\$90.80	\$25,930.80
128206	01/31/2021	\$5,920.00	\$12.10	\$5,932.10
128207	02/28/2021	\$20,960.00	\$85.88	\$21,045.88
128208	03/31/2021	\$15,360.00	\$23.85	\$15,383.85
128228	04/30/2021	\$9,680.00	\$12.93	\$9,692.93

Total Amount Due on Current and Prior Invoices: \$186,579.71

Pachulski Stang Ziehl & Jones LLP

150 California St.
Floor 15th
San Francisco, CA 94111

June 30, 2021

Kavita Gupta
Gupta Ferrer LLP
1300 Bristol Street North ste. 100
Newport Beach, CA 92660

Invoice 128214
Client 33085
Matter 00001
JDF

RE: Desert Oasis Apartments LLC

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2021

FEES	\$25,520.00
EXPENSES	\$24.03
TOTAL CURRENT CHARGES	\$25,544.03
BALANCE FORWARD	\$186,579.71
TOTAL BALANCE DUE	\$212,123.74

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	800.00	26.30	\$21,040.00
JDF	Fiero, John D.	Partner	800.00	5.60	\$4,480.00
				<hr/> 31.90	<hr/> \$25,520.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	5.70	\$4,560.00
CA	Case Administration [B110]	3.10	\$2,480.00
CO	Claims Admin/Objections[B310]	23.10	\$18,480.00
		31.90	<hr/> \$25,520.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Lexis/Nexis- Legal Research [E	\$15.33
Pacer - Court Research	\$8.70
	<hr/>
	\$24.03

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
06/01/2021	JDF	BL	TC with J. Fischer re mediation strategy	0.40	800.00	\$320.00
06/01/2021	GSG	BL	Review/revise chart and confer with M. Renck re mediator availability.	0.30	800.00	\$240.00
06/01/2021	GSG	BL	Email K. Gupta re June mediation and mediators.	0.20	800.00	\$160.00
06/01/2021	GSG	BL	Telephone call with J. Fischer re mediation and settlement discussions.	0.40	800.00	\$320.00
06/02/2021	JDF	BL	Confer with G. Greenwood and client re mediation briefing strategy	0.20	800.00	\$160.00
06/02/2021	GSG	BL	Telephone call with J. Fiero re mediation and settlement status.	0.10	800.00	\$80.00
06/07/2021	GSG	BL	Telephone calls and emails with J. Fischer re mediation status.	0.20	800.00	\$160.00
06/11/2021	JDF	BL	All hands conference call with client, K. Coleman, J. Fischer and M. Wray re litigation settlement posture	1.20	800.00	\$960.00
06/11/2021	GSG	BL	Conference call with K. Gupta, K. Coleman, J. Fiero, J. Fischer, and M. Wray re litigation and settlement.	1.20	800.00	\$960.00
06/15/2021	JDF	BL	Strategy call with K. Coleman and G. Greenwood	0.30	800.00	\$240.00
06/15/2021	GSG	BL	Review docket and confer with J. Fiero re DL claims deadline.	0.20	800.00	\$160.00
06/15/2021	GSG	BL	Telephone call with J. Fiero and K. Coleman re equitable indemnity claim.	0.30	800.00	\$240.00
06/18/2021	JDF	BL	TC with J. Fischer and G. Greenwood re settlement	0.10	800.00	\$80.00
06/18/2021	GSG	BL	Telephone call with J. Fiero and J. Fischer re settlement status and mediation scheduling.	0.10	800.00	\$80.00
06/21/2021	JDF	BL	Exchange emails with J. Fischer re keeping lines of communication open on settlement topic	0.20	800.00	\$160.00
06/28/2021	JDF	BL	Exchange emails with other professionals regarding mediation timing	0.30	800.00	\$240.00
				5.70		\$4,560.00

Case Administration [B110]

06/04/2021	GSG	CA	Telephone call with J.Fischer re mediation and settlement talks; email J. Fiero re status.	0.10	800.00	\$80.00
06/09/2021	JDF	CA	Conference call with client and G. Greenwood re case posture	0.30	800.00	\$240.00
06/09/2021	JDF	CA	Conference call including client, G. Greenwood and K. Coleman re claim objection strategy (.7)	0.70	800.00	\$560.00
06/09/2021	GSG	CA	Conference call with K. Gupta and J. Fiero.	0.30	800.00	\$8,000.00
06/09/2021	GSG	CA	Conference call with K. Gupta, J. Fiero, and K. Coleman re claim objection, mediation, and settlement.	0.70	800.00	\$8,000.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/09/2021	GSG	CA	Telephone call with J. Fischer re settlement status and scheduling call with all professionals.	0.50	800.00	\$480.00
06/09/2021	GSG	CA	Emails re scheduling.	0.10	800.00	\$480.00
06/13/2021	JDF	CA	Look into prior representations by Gubner firm (.3); Email to C. Carlyon re same (.1)	0.40	800.00	\$320.00
				3.10		\$2,480.00

Claims Admin/Objections [B310]

06/01/2021	GSG	CO	Draft objection re Desert Land claim; draft factual background.	4.90	800.00	\$3,920.00
06/02/2021	GSG	CO	Research re res judicata and review Golden authorities.	2.10	800.00	\$1,680.00
06/02/2021	GSG	CO	Draft objection re Desert Land claim; draft legal analysis re common counts and res judicata.	6.30	800.00	\$5,040.00
06/03/2021	GSG	CO	Draft objection re Desert Land claim; draft legal analysis re inapplicability of res judicata.	8.30	800.00	\$6,640.00
06/16/2021	JDF	CO	Legal research re implied equitable indemnity and potential counterclaim to DLA claim in DOA case	1.50	800.00	\$1,200.00
				23.10		\$18,480.00

TOTAL SERVICES FOR THIS MATTER:

\$25,520.00

Pachulski Stang Ziehl & Jones LLP
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Expenses

06/02/2021	LN	33085.00001 Lexis Charges for 06-02-21	\$15.33
06/30/2021	PAC	Pacer - Court Research	\$8.70
Total Expenses for this Matter			\$24.03

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REMITTANCE ADVICE

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For current services rendered through: 06/30/2021

Total Fees \$25,520.00

Total Expenses \$24.03

Total Due on Current Invoice \$25,544.03

Outstanding Balance from prior invoices as of 06/30/2021 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
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128207	02/28/2021	\$20,960.00	\$85.88	\$21,045.88
128208	03/31/2021	\$15,360.00	\$23.85	\$15,383.85
128212	04/30/2021	\$9,680.00	\$12.93	\$9,692.93
128213	05/31/2021	\$4,080.00	\$59.06	\$4,139.06

Total Amount Due on Current and Prior Invoices: \$212,123.74